

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**DEFENDANTS' MOTION TO DISMISS
PLAINTIFFS' CLASS ACTION COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendants FPMC Services, LLC, The Management Company at Forest Park Medical Center, Neal Richards Group, LLC, Neal Richards Group Forest Park Development, LLC, and glendonTodd Capital, LLC (collectively, “Defendants”) file this Motion to Dismiss Plaintiffs’ Class Action Complaint and respectfully show as follows:

1. In their Class Action Complaint (Dkt. No. 1), Plaintiffs Sharda Parker and Jose Ibanez (collectively, “Plaintiffs”) vaguely allege causes of action for violation of the Worker Adjustment and Retraining Notification Act, breach of contract, and quantum meruit arising out of their former employment as workers at Forest Park Medical Center in Dallas, Texas.

2. As further shown in Defendants' Brief in Support of their Motion to Dismiss Plaintiffs' Class Action Complaint filed contemporaneously herewith, Plaintiffs' Class Action

Complaint fails to state a plausible claim for relief against Defendants on any claim, and these claims should be dismissed.

3. Because Plaintiffs have not stated a plausible claim for relief, their class action claim should be dismissed.

Accordingly, Defendants respectfully request that this Court dismiss all of Plaintiffs' claims pursuant to Rule 12(b)(6), dismiss Plaintiffs' class action claims, and grant any other and further relief to which Defendants may be justly entitled.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been furnished to all counsel of record in accordance with the Federal Rules of Civil Procedure this 3rd day of November, 2016.

/s/ Jacob B. Kring

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